



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101-3140

JAN 27 2017

OFFICE OF  
COMPLIANCE AND ENFORCEMENT

Reply To: OCE-101

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Mr. Mike Brown  
Branch Manager  
Wilbur-Ellis Company  
38202 SR 27  
Oakesdale, Washington 99158

Re: Inspection of Risk Management Program (RMP)  
EPA RMP Facility ID# 1000 0007 8391

Dear Mr. Brown:

On June 7, 2016, the U.S. Environmental Protection Agency (EPA) conducted an inspection of the Wilbur-Ellis Company, located at 38202 SR 27 in Oakesdale, Washington. The purpose of the inspection was to evaluate compliance with Section 112(r) of the Clean Air Act also known as the Risk Management Program (RMP). The RMP inspection was conducted pursuant to the authorities under Section 112(r) and Section 114 of the Clean Air Act. Listed below are the areas of concern identified by EPA:

1. **Safety Information**: Wilbur-Ellis Company failed to use the codes and standards to design and build the anhydrous ammonia storage process as required by 40 C.F.R. § 68.48(a)(5). The pressure relief system for the anhydrous ammonia storage vessel, using one dual relief valve manifold with two relief valves, does not provide adequate relief capacity when isolated for replacing a single pressure relief valve. Reference ANSI K.61.1-1999 and CGA-2.1-2014, 6th Ed., Requirements for the Storage and Handling of Anhydrous Ammonia, Section 5.8, Pressure Relief Devices.
2. **Safety Information**: Wilbur-Ellis Company failed to ensure that the anhydrous ammonia storage process is designed in compliance with recognized and generally accepted good engineering practices as required by 40 C.F.R. § 68.48(b). The pressure relief system for the anhydrous ammonia storage vessel, using one dual relief valve manifold with two relief valves, does not provide adequate relief capacity when isolated for replacing a single pressure relief valve. Reference ANSI K.61.1-1999 and CGA-2.1-2014, 6th Ed., Requirements for the Storage and Handling of Anhydrous Ammonia, Section 5.8, Pressure Relief Devices.

The following area of concern was identified during the RMP inspection:

1. The emergency shutoff pull cable was not placarded. The emergency shutoff pull cable should be clearly placarded and referenced in standard operating procedures relating to emergency shutdown.

Please provide the documentation to substantiate that the areas of concern listed above have been corrected. A copy of the documents must be sent to Javier Morales, RMP Coordinator, within 14 days of your receipt of this letter. The documents may be sent via e-mail, fax or mail.

Javier Morales, RMP Coordinator  
U.S. EPA Region 10  
1200 Sixth Avenue, Suite 900, OCE-101  
Seattle, WA 98101  
Fax: (206) 553-4743

Please refer to the document *General Risk Management Program Guidance*, for additional information pertaining to the areas of concern addressed above. This guidance document can be found on EPA's website at: <http://www.epa.gov/rmp/guidance-facilities-risk-management-programs-rmp>

We urge you to take the steps necessary to address these concerns, and to ensure that all aspects of your operation are conducted in accordance with all applicable federal, state, and local requirements. If, in the future, additional violations are identified and/or corrections to the identified concerns are not made, EPA may proceed with enforcement action. If you have any questions about the inspection or the Risk Management Program, please contact Javier Morales, RMP Coordinator, at (206) 553-1255 or [morales.javier@epa.gov](mailto:morales.javier@epa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Kelly McFadden", is written over the typed name.

Kelly McFadden, Manager  
Pesticides and Toxics Unit